



WALLA WALLA EMERGENCY SERVICES COMMUNICATIONS CENTER WESCOM

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March 29, 2005

Ms. Marlene Dortch
Secretary Federal Communications Commission
445 12th Street SW
Washington, DC 20554

SUBJECT: WT Docket 94-102

Walla Walla Emergency Services Communications Center (WESCOM) provides the crucial link between 911 callers and emergency service providers that operate in Walla Walla County, Washington. In addition, we monitor and record incident progress for law enforcement, fire, and medical staff. We provide service to the 56,700 residents in the 1,300-square-mile county, as well as the untold number of citizens that pass into and through the region each day. During 2004, our dispatch center responded to over 27,014 911 calls, answered 136,175 non-911 calls, and dispatched over 47,600 calls-for-service.

Docket 94-102 would have far reaching and potentially damaging impact on this county's most vulnerable citizens—those in emergency situations. WESCOM has met all federally mandated requirements and is Phase II compliant. We intend to provide the same level of service for wireless and landline 911 callers. A large measurement area could leave our public safety answering points (PSAPs) with very poor levels of accuracy. Docket 94-102 intends that each PSAP receives the wireless E911 accuracy levels that were specified by the Federal Communications Commission. In order to accomplish that agenda, compliance testing must be conducted at the PSAP, county, or statistical area (whichever is smaller).

Acceptable accuracy testing across the state does not guarantee that an agricultural county with a small population base (like Walla Walla County) will receive equal treatment/performance. Few people per mile ratio means that wireless carriers operating in our geographic region have less financial incentive to ensure their system meets E911 accuracy requirements.

I encourage the Federal Communications Commission to establish clear guidance regarding the relevant geographic area in which wireless carriers must provide locally proven E9-1-1 accuracy that falls within the specified levels. Without regulations requiring compliance testing to be conducted at the PSAP, county, or statistical level, Walla Walla County may end up on the low end of a state-wide accuracy testing. This County strongly supports the position submitted by APCO International on this issue.

Signed,

A handwritten signature in black ink, appearing to read "Dan Aycock".

Captain Daniel Aycock
Communications Manager